

PRIVATE RADIO BUREAU
SPECIAL DELIVERY

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amateur K3TXBefore the
Federal Communications Commission
Washington DC 20554

FCC MAIL ROOM

In the Matter of)

Amendment of the Amateur Service Rules to)
Implement a Vanity Call Sign System)Notice of Proposed
Rulemaking
PR Docket No. ~~97-305~~

93-305

1. Respondent's qualifications:

Respondent has been licensed and active in the Amateur Service for more than thirty (30) years, and has held the appointment of Assistant Director in the American Radio Relay League for approximately twenty (20) years. His duties in this capacity are to act as liaison between local amateurs and the elected director of the League for whom he serves. He regularly surveys the active Amateur operators for whom he reports with regard to varied matters concerning the service, and specifically the proposal at hand.

2. The Amateur's assigned callsign serves as his identity within the service even more than his name. Thus his callsign is of significant though intangible importance to him.

3. Historically, within the jurisdiction of the Commission, callsigns have been assigned in a well-defined sequence, without re-assignment of previously issued but abandoned calls./-1 This manner of issuance of

callsigns generally results in the callsign reflecting the longevity or seniority of its holder within the service./-2

4. Respondent recognizes that Commission rules and policies have prohibited issuance of special callsigns due to the added workload and lack of proper data-processing facilities. The issue was addressed several years ago wherein special callsigns would be assigned through a voluntary third party; after a comment period the proposal was summarily dismissed. Respondent states that the conditions leading to the dismissal of the proposal then are unchanged and the current proposal should be dismissed without action, for reasons stated below.

5. It is understood that present computer facilities permit reissuance of special-request callsigns; also that the Commissioners are agreeable to the proposal, presumably on the basis of "give them what they want, if practical." The Notice, in I. Introduction, states in part, "The ardent desire of amateur operators for call signs of choice . . ." would indicate that the majority of active amateur operators are very much in favor of the Vanity Call Sign proposal or at least are non-committal. This appears not to be the actual situation. Respondent believes that a significant majority of United States Amateur Radio operators do not want special callsigns to be available. Respondent has gained this belief through unbiased surveys of a number of Amateurs. More than 90% of those surveyed were strongly against adoption of the proposal.

6. The strongest reason given for opposition to the proposed program is that the present call sign assignment system gives a good indication of the licensee's seniority in the service. /-1 Interestingly, this reasoning appears to be strongest among the most recently licensed amateur operators.

7. Respondent recognizes that Commission workload is of major importance in any proposed rulemaking. It is possible that the additional workload on Commission personnel in conjunction with special callsigns will not be justified by the fees collected, considering the small number who would be requesting them.

8. It is understood from the Notice as published that any Vanity Call sign would not conflict with the present license class - call sign format. It is additionally suggested that if the proposal should be adopted the individual selection of call sign be restricted to the call sign suffix, the prefix to correspond with the then-current prefix that would be assigned in the (as at present) strict rotation scheme. This would at once preserve the apparent seniority indicated by the callsign while permitting those interested near-free choice of suffix. /-3 It is also suggested that a licensee be permitted to regain a callsign that he previously held, should it remain unassigned.

9. Summary

Respondent requests the Proposal be denied: A significant majority of amateurs strongly opposes its adoption; there could be a net cost to the Commission by its adoption.

Alternatively, the Proposal should be modified to permit free choice of call sign suffix, the prefix to be consistent with then-current rotation as determined by location and license class, or that a previously-held callsign be re-assigned.

Notes::

1. Unused Wx3 callsigns were re-assigned about forty (40) years ago; unassigned two-letter calls were re-assigned in late '60's and early '70's. Otherwise, with some minor exceptions, the seniority of most calls within the 48 states is, from earliest, W#ccc, K#ccc, WA#ccc, WB#ccc, WD#ccc, N#ccc, KA#ccc, KB#ccc, KC#ccc; there is distortion due to voluntary change of call because of change of address, or license class.

2. A Wx3 callsign is generally at least 35 years old, etc.

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